

**From:** Imhoff, Robert [imhoff.robert@epa.gov]  
**Sent:** 10/22/2018 5:53:36 PM  
**To:** Feldman, Michael [Feldman.Michael@epa.gov]  
**CC:** Snyder, Erik [snyder.erik@epa.gov]  
**Subject:** RE: Ex. 5 Deliberative Process (DP) TX error-correction FRN?

## Ex. 5 Deliberative Process (DP)

### Changes to the Regulatory SO<sub>2</sub> Monitoring Network

On January 15, 2016, the TCEQ provided the EPA with a list of 25 SO<sub>2</sub> sources meeting the DRR emissions applicability threshold. Based on the need to characterize air quality for the purposes of making area designations, the TCEQ will deploy source-oriented SO<sub>2</sub> monitors near 13 sources by the January 1, 2017, rule deadline. Due to the close geographical proximity of 4 out of the 13 sources, a total of 11 monitoring stations, listed in Table 2, are proposed for deployment to characterize ambient air quality surrounding each of these sources. The EPA is expected to finalize area designations for the remaining 12 sources by July 2, 2016. The TCEQ will pursue monitoring station locations as expeditiously as practical for any of the 12 remaining sources designated as nonattainment under the EPA's final action.

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**From:** Imhoff, Robert  
**Sent:** Monday, October 22, 2018 8:07 AM  
**To:** Michael Feldman (Feldman.Michael@epa.gov) <Feldman.Michael@epa.gov>  
**Cc:** Erik Snyder (snyder.erik@epa.gov) <snyder.erik@epa.gov>  
**Subject:** Ex. 5 Deliberative Process (DP) TX error-correction FRN?

The FRN contains the following timeline.

On June 29, 2016, timely meeting its DRR option selection deadline, Texas separately communicated to the EPA that it had chosen the monitoring pathway for these areas to meet its obligations to characterize air quality for the sources in these areas that were listed under the DRR. In Texas' annual monitoring network plan for 2016, the state indicated that it intended to site new SO<sub>2</sub> monitors in any Round 2 area that the EPA designated as nonattainment. Following up on this intention, in its 2017 annual monitoring network plan, Texas included new proposed SO<sub>2</sub> monitoring sites in Freestone, Titus, and Rusk Counties to assess air quality in the three new SO<sub>2</sub> nonattainment areas involving Vistra Energy sources. Texas referred to the 2016 Sierra Club modeling analysis, among other information, to inform their proposed siting of the new monitors, but stated: "The use of the 2016 Sierra Club modeling analysis for possible monitor placement

decisions does not infer TCEQ's concurrence with the use of this modeling analysis for any other purpose.”<sup>[1]</sup> The EPA approved the three monitor siting proposals in an August 10, 2017, letter to TCEQ.<sup>[2]</sup>

## Ex. 5 Deliberative Process (DP)

-Bob

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<sup>[1]</sup> Appendix E: Sulfur Dioxide Data Requirements Rule Monitor Placement Evaluations, from 2017 TCEQ Annual Monitoring Network Plan.

<sup>[2]</sup> TCEQ subsequently deployed SO<sub>2</sub> monitors near Big Brown on October 30, 2017, and near Martin Lake on November 1, 2017. No monitors were deployed in the area around Monticello as the source was retired on February 8, 2018 (*see* 2018 TCEQ Annual Monitoring Network Plan).